EXHIBIT H

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

Soverain Software LLC, §	
§	
Plaintiff, §	
§	
v. §	Civil Action No. 6:07-cv-511
§	
CDW Corporation, Newegg Inc., §	
Redcats USA, Inc., Systemax Inc., §	
Zappos.com, Inc., Redcats USA, L.P., §	
The Sportsman's Guide, Inc,. and §	
TigerDirect, Inc. §	
§	
Defendants. §	
§	

DECLARATION OF TODD LEE

I, Todd Lee, declare as follows:

1.   The statements made herein are made from my own personal knowledge, are within my personal knowledge, and are true and correct.

2.   I am U.S. citizen, residing in Pompano Beach, Florida. I am over the age of eighteen and competent in all respects to make this declaration under oath.

3.   I am the Executive Vice-President of Worldwide IT for defendant TigerDirect, Inc. ("*TigerDirect*").

4.   The success of TigerDirect and affiliated companies is largely due to our proprietary website technology and underlying processes which together give us a competitive edge over the competition.

5.   Physical review of the source code could allow an unscrupulous individual with the proper skill set to achieve a SQL and/or URL based methods of attack which could potentially bring down our systems completely.

6.   Due to the tight integration of our websites with several additional internal private-network based systems which maintain purchase information, customer personal information, payment processing and more, physical review of the source code could also potentially allow an individual to determine a methodology to violate the privacy and confidentiality of the company, its suppliers, and millions of its customers.

7.   The operation of the websites and our internal systems are driven by tens of thousands of lines of source code which have been developed by multiple development teams, some of which are no longer with the company, on various software platforms and, therefore, there is no uniform documentation describing the source code.

8.   Since our source code lacks uniform documentation, we are not able to identify in advance where in the source code are all backdoors, passwords and other programming routines which provide access to our system, enterprise data, and enable our system to operate. This makes it

impossible for us to "block access" to the critically sensitive personal information of our customers.

9.   To disable and or remove all backdoors, passwords and other such functionality would require the review of the entire source code and expense of thousands of programming man-hours.

10.   Also, because of our inability to know where all backdoors, passwords and other such functionality are exactly in the source code to disable and or remove them, a reviewer unfamiliar with our systems would require our continuous support, and if the review is not done onsite, providing such support would be very demanding if not impossible.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on August 18, 2008.

Todd Lee

NOTARY Public

Notary Public State of Florida
Nadia Barreto
My Commission DD380313
Expires 01/21/2009